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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA,
SOUTHERN DIVISION**

LISA LIBERI, et al,

Plaintiffs,

vs.

ORLY TAITZ, et al,

Defendants.

CIVIL ACTION NUMBER:

8:11-cv-00485-AG (AJW)

DECLARATION OF LISA LIBERI

Date of Hearing: June 13, 2011

Time of Hearing: 10:00 a.m.

Location: Courtroom 10D

Declaration of Lisa Liberi

I, Lisa Liberi, am over the age of eighteen [18] and am a party to the within action. I have personal knowledge of the facts herein, and if called to do, I could and would competently testify. I am making this Declaration under the penalty of perjury of the Laws of the United States pursuant to 28 U.S.C. §1746.

1. I filed suit against Ms. Taitz and the other Defendants as a result of the illegal background check conducted on me; the illegal access of my credit

1 reports; the illegal disclosure of my full Social Security number, date of birth,
2 place of birth, mother's maiden name, father's name, home address, telephone
3 number, the harassment of my friends and family, and Ms. Taitz's disclosure of my
4 private details to John Mark Allen, my son's father who my son and I were
5 provided protection from as a result of the crimes committed against us. Ms. Taitz
6 continues twisting the reasons Plaintiffs filed suit and continues misstating the
7 truth.
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11 2. Ms. Taitz continues stating I am a career document forger and that I
12 have a criminal record going back to the 1990's. This is **not** true; I do **not** have a
13 criminal record going back to the 1990's and I have **not** been convicted of forgery
14 of documents or document forgery.
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16 3. Ms. Taitz knows where I reside as she put my home address out all
17 over the Internet and filed it with this Court on July 29, 2010. In fact, a dangerous
18 criminal, Ruben Nieto, who attempted to get paid by Ms. Taitz lives in
19 Albuquerque, New Mexico, forty-five [45] minutes from my house.
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22 4. Ms. Ostella was set-up as Ms. Taitz's customer contact in Ms. Taitz's
23 PayPal account. This did **not** give Ms. Ostella access to Ms. Taitz accounts, but
24 instead it carbon copied Ms. Ostella's email address for PayPal payment requests
25 from Ms. Taitz's PayPal account.
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1 5. Further, Ms. Taitz has harassed every governmental agency in New
2 Mexico to the point they called in the New Mexico Attorney General to put a stop
3 to Ms. Taitz harassing and illegal behaviors.
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5 6. Moreover, Ms. Taitz called on her readers, followers and supporters to
6 contact the law enforcement agency where I reside; she continued calling on them
7 to further cyber-stalk; cyber-harass; and cyber-bully me, which they did.
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9 7. I have received nonstop phone calls stating I am going to meet my
10 maker real soon if I don't drop this lawsuit against Ms. Taitz. I have had strange
11 individuals show up at my home, peeking in my windows, scrambling my phones,
12 all after Ms. Taitz's publication of my home address and telephone number.
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15 8. My local law enforcement has been forced to take reports for stalking,
16 cyber-stalking, cyber-harassment, cyber-bullying; fraud; forgery; identity theft;
17 threats, where they have listed the prime suspect as Orly Taitz. This is a result of
18 Orly Taitz publishing and continued republishing of her threats against me, her
19 calling for her supporters for help regarding me; and her continued publishing of
20 my full Social Security number, my maiden name, my mother's maiden name, my
21 father's name, my home address, my place of birth, my date of birth and my
22 husband's primary identification information. As a result, my husband and my
23 identities have been stolen, our credit has been used repeatedly, accounts have
24 been set-up fraudulently in our names using our identifying information, my credit
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1 report shows me residing in States I have never resided including but **not** limited to
2 Massachusetts and Iowa. All the law enforcement reports were forwarded to the
3 Federal Bureau of Investigations as the crimes crossed several state lines.
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5 9. As a result of Ms. Taitz's continued harassment, cyber-stalking,
6 cyber-bullying, cyber-harassment, and other illegal acts, I have had to have
7 emergency service from the paramedics numerous times, emergency room visits,
8 cardiac treatments and hospitalizations due to the complications I suffered with my
9 heart and other medical conditions, resulting from stress induced by Orly Taitz and
10 the other Defendants. This has cost my family in excess of \$250,000.00. My
11 medical bills to date were provided to Judge Robreno on December 20, 2010.
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15 10. Ms. Taitz is well aware of what she is doing; she has talked about my
16 medical complications on her radio shows, TV appearances and in her pleadings
17 filed with this Court.
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19 11. Ms. Taitz is well aware of the fact I do **not** reside in the State of
20 California. Ms. Taitz has stalked my son; has published trips my son has taken;
21 and private details about my son. My son attends school in New Mexico where we
22 reside and admitted to this in Ms. Taitz's statements in her radio appearance on the
23 Andrea Shea-King Radio show which can be found on the Internet at
24 [http://www.blogtalkradio.com/askshow/2010/08/31/the-andrea-shea-king-](http://www.blogtalkradio.com/askshow/2010/08/31/the-andrea-shea-king-show.mp3)
25 [show.mp3](http://www.blogtalkradio.com/askshow/2010/08/31/the-andrea-shea-king-show.mp3). In this Radio program, Ms. Taitz states:
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1 “...Against Neil Sankey, a top notch private investigator who was the
2 first one to find all of this information on Social Security
3 numbers...I'm sorry but this woman Lisa Liberi is supposed to be
4 back in prison...And I have provided directions, I have provided the
5 pictures. Here's her picture that came from her boyfriend: ‘That's Lisa
6 Liberi, I have a child with her’”.

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9 12. As I am sure this Court is aware, directions can be to a location or it
10 can be to do something.
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12 13. Ms. Taitz continues in this radio program accusing me of being a
13 career document forger; and then states I accused her of trying to hire a “hitman”
14 to kidnap my son, and then Taitz asks her audience, did something happen to
15 Liber’s son? I have never claimed Taitz attempted to hire a “hitman” or that Ms.
16 Taitz was going to have my son kidnapped. Ms. Taitz is the one who continually
17 uses “hitman”. I have stated that it appears Ms. Taitz has attempted to hire a
18 dangerous criminal to harm Lisa Ostella, me and our family’s.
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22 14. Orly Taitz threatened to take Mr. Berg down and to do so she was
23 going to destroy me and get rid of me. Ms. Taitz also threatened to have Ms.
24 Ostella’s children professionally kidnapped. A man in Albuquerque, NM attempted
25 to get paid by Ms. Taitz in three [3] consecutive money requests totaling Twenty-
26 Five Thousand [\$25,000.00] Dollars. The requests came in consecutively in the
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1 amount of Nine Thousand [\$9,000.00] Dollars and two (2) in the amount of Eight
2 Thousand [\$8,000.00] Dollars totaling Twenty-Five [\$25,000.00] Dollars, as on
3 file with this Court. Mr. Nieto requested payment twice, on May 25, 2009 and
4 May 29, 2009, in the middle of the night. It was concerning to see the requests
5 were under the Ten Thousand [\$10,000.00] Dollar reporting amounts pursuant to
6 the Patriot Act.
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9 15. A spokeo was run on this man, Rubin Nieto and his email address.
10 Spokeo returned that Mr. Nieto resided in Albuquerque, NM and provided his birth
11 date. A simple search of the New Mexico Judiciary System returned Mr. Nieto's
12 convictions for Aggravated Assault. Further searches confirmed Mr. Nieto was
13 not an Attorney, or a Private Investigator, or a trade which a licensed attorney
14 would hire for permissible purposes. Instead, Mr. Nieto has websites selling porno
15 and marijuana seeds.
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19 16. So yes, I do believe Ms. Taitz attempted to hire this man to carry out
20 her threats towards me and Mrs. Ostella, to harm me and my family and harm Mrs.
21 Ostella and her family. Ms. Taitz never disputed that Mr. Nieto's PayPal money
22 requests were not from her PayPal account. I asked Ms. Taitz on December 20,
23 2010 in Judge Robreno's Courtroom if she was saying the PayPal account the
24 money requests from Mr. Nieto was not her PayPal account, and Ms. Taitz
25 answered "NO", because they were. See the December 20, 2010 Transcript, page
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1 94, lines 7-11, filed on the docket January 14, 2011, appearing as Docket Entry
2 162.

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4 17. Further, anything I confirm regarding my address information with
5 this Court will be placed all over the Internet by Ms. Taitz. For this reason, I will
6 **not** provide a copy of my Driver's License to Ms. Taitz or even show it to her for
7 that matter.
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11 I declare under the penalty of perjury of the Laws of the United States and
12 California that the foregoing is true and correct.
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14 Executed this 4th day of May, 2011.

15
16 /s/ Lisa Liberi
17 Lisa Liberi, Declarant
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